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9 **ATTORNEY FOR DEBTOR[S]**

10 **UNITED STATES BANKRUPTCY COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 **In Re:**

**Case No: 10-35809-A-7**  
**DC No. MDB-1**

13  
14 **VARDAN KARAGYEZYAN**

15 **(Amended as to the highlighted info)**

**AMENDED MOTION TO**  
**COMPEL**  
**ABANDONMENT OF**  
**PROPERTY OF THE ESTATE**  
**11 USC 554**

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17  
18 **\_\_\_\_\_ Debtor \_\_\_\_\_/**

**Date: August 23, 2010**  
**Time: 9:00 a.m.**  
**Judge: MCMANUS**  
**Dept: A, Rm 28, 7<sup>th</sup> Flr.**

19 Debtor moves the Court as follows:

- 20 1. Debtor is self-employed doing business as New Life Shoe Repair, a sole  
21 proprietorship.  
22 2. Debtor Scheduled business assets and claimed them exempt.  
23 3. Debtor's business activities are licensed and insured.  
24 4. More details are provided by Debtor's Declaration and Exhibits Thereto.  
25 5. Debtor's business is burdensome to the estate and his business assets are of  
26 inconsequential value and benefit to the estate.  
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1                   **Wherefore, Debtor(s) Pray:**

2           1.     That the Court compel the Trustee to abandon Debtor's business and business  
3                   assets from the bankruptcy estate.

4           2.     For other relief the Court deems just and proper.

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6     Dated: July 23, 2010

Law Offices of Mark D. Bradford

7                   By: /s/ \_\_\_\_\_  
8                         Mark D. Bradford, Attorney at Law